

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

SHANIKA K. BOYD,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Civil Action No. 3:12-cv-00830
EQUIFAX INFORMATION SERVICES, LLC, et al.	)	
	)	
Defendants.	)	

**DEFENDANT PROFESSIONAL ACCOUNT MANAGEMENT, LLC'S  
MEMORANDUM SUPPORTING UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE ANSWER TO COMPLAINT**

Defendant, Professional Account Management, LLC ("PAM"), by counsel, states the following in support of its Motion For Extension Of Time To File Answer To Complaint:

1. PAM was served with the Complaint on November 27, 2012.
2. Accordingly, PAM's responsive pleadings were due on December 18, 2012.
3. PAM attempted to find counsel, and out-of-state counsel was retained. Undersigned local counsel was retained only yesterday.
4. Before it retained undersigned counsel, out-of-state counsel for PAM requested an extension of time to file responsive pleadings to February 15, 2013. Counsel for the Plaintiff agreed to the extension to February 15, 2013.
5. The parties did not submit a Consent Order, however. When retained, local counsel informed PAM that submitting a Consent Order was the required practice in this district.
6. This Motion is unopposed by the Plaintiff. Submitted with this Motion is a Consent Order extending the time by which PAM must file responsive pleadings to February 15, 2013.

7. Pursuant to Local Rule 7(F)(2), briefs are required for an extension of time to file responsive pleadings if the time to respond has already expired. PAM files this brief out of an abundance of caution.

8. Notwithstanding that the parties failed to file a Consent Order confirming their agreement, based on the agreement of the parties, for good cause (the expediency of this litigation), because any delay was excusable neglect, and pursuant to the Court's powers under Federal Rule of Civil Procedure 6, PAM requests that the Court extend the time by which PAM must file responsive pleadings.

WHEREFORE, Professional Account Management, LLC respectfully requests that the Court grant its Unopposed Motion For Extension Of Time To File Responsive Pleadings, enter the Consent Order submitted with its Motion, deem timely filed the Answer PAM is filing contemporaneously with the filing of this Motion, and grant it any other relief the Court deems proper.

Dated: February 15, 2013

Respectfully submitted,

Professional Account Management, LLC

By:                     /s/                      
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of February 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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/s/

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